

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

vs.

STEFAN QIN, VIRGIL TECHNOLOGIES
LLC, MONTGOMERY TECHNOLOGIES
LLC, VIRGIL QUANTITATIVE
RESEARCH, LLC, VIRGIL CAPITAL LLC,
and VQR PARTNERS LLC,

Defendants.

Case No.: 20-cv-10849 (JGLC)

JOINT STIPULATION

Petitioner Robert A. Musiala, Jr. in his capacity as the Court-appointed receiver (“Receiver”), by and through his attorneys of record, and non-party respondents Nasir Adaya and Phuong Nguyen (“Respondents”), make the below stipulation:

WHEREAS, on August 4, 2023, the Receiver filed a motion to compel the turnover of the Disputed Assets (“Motion”);

WHEREAS, on September 8, 2023, the Receiver and Respondents filed a Joint Stipulation setting forth the briefing schedule related to the Motion, which the Court so-ordered on September 11, 2023;

WHEREAS, pursuant to the Joint Stipulation, on October 27, 2023, Respondents filed their opposition to the Motion (“Opposition”) along with a Motion to Strike Portions of Document 254 (“Motion to Strike”);

WHEREAS, due to changes in his counsel’s schedule, the Receiver has requested an extension to file his reply to the Opposition (“Reply”) as well as his opposition to the Motion to Strike;

WHEREAS, the Receiver and Respondents have met and conferred to address these requests;

NOW THEREFORE, IT IS HEREBY STIPULATED, subject to Court approval and order, and agreed to by and between the Receiver and Respondents, through their respective counsel of record, that:

1. The previous briefing schedule shall be amended;
2. The Receiver shall be permitted to submit his Reply in further support of the Motion along with his Opposition to the Motion to Strike by December 1, 2023.
3. The Receiver will not oppose a request, if any, by the Respondents to file a sur-reply.

Dated: November 3, 2023
New York, New York

Respectfully submitted,

BAKER & HOSTETLER, LLP

By: /s/ Marco Molina
Marco Molina
45 Rockefeller Plaza
New York, NY 10111
Tel: (212) 589-4200
Email: mmolina@bakerlaw.com
Attorney for the Receiver

FARELLA BRAUN + MARTEL LLP

By: /s/ Aviva J.B. Gilbert & Gary M. Kaplan
Aviva J.B. Gilbert & Gary M. Kaplan
One Bush Street, Suite 900
San Francisco, CA 94104
Tel: (415) 954-4400
Email: agilbert@fbm.com; gkaplan@fbm.com
Attorneys for the Respondents

* * *

SO ORDERED:

Jessica Clarke
Hon. Jessica G. L. Clarke
United States District Judge

Dated: November 6, 2023
New York, New York